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FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

Jun 30, 2025

SEAN F. McAVOY, CLERK

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,
Plaintiff,
v.
THEODORE TRAVIS UMTUCH,
Defendant.

No. 1:25-CR-02063-SAB

**STIPULATED PROTECTIVE
ORDER REGARDING
IDENTIFICATION OF MINOR
VICTIM OR WITNESS**

Before the Court is parties' Stipulation for Protective Order Regarding Identification of Minor Victim or Witness Pursuant to 18 U.S.C. § 3509, ECF No. 24. Defendant is represented by J. Stephen Roberts, Jr. The United States is represented by Michael Murphy. The motion was considered without oral argument.

The parties request the Court enter a stipulated protective order to protect the identities of the child victims or witnesses and pursuant to 18 U.S.C. § 3509(d)(3)(ii). The Court grants the motion.

Accordingly, **IT IS HEREBY ORDERED:**

1. The parties' Stipulation for Protective Order Regarding Identification of Minor Victim or Witness Pursuant to 18 U.S.C. § 3509, ECF No. 24, is **GRANTED**. The Court enters the Protect Order as follows:

**ORDER STIPULATED PROTECTIVE ORDER REGARDING
IDENTIFICATION OF MINOR VICTIM OR WITNESS ~ 1**

1 1. IT IS ORDERED that the privacy protection measures mandated by 18
2 U.S.C. § 3509(d), which apply when a case involves a person under the age of eighteen
3 (18) years who is alleged to be a victim of a crime of sexual exploitation, or a witness
4 to a crime committed against another person, apply to this case.

5 2. IT IS FURTHER ORDERED that all persons acting in this case in a
6 capacity described in 18 U.S.C. § 3509(d)(1)(B), shall:

- 7 a. Keep all documents that disclose the names, identities, or any other
8 information concerning minors in a secure place to which no person
9 who does not have reason to know their contents has access;
- 10 b. Disclose such documents or the information in them that concerns
11 minors only to persons who, by reason of their participation in the
12 proceeding, have reason to know such information;
- 13 c. Not permit Defendant himself to review discovery outside the
14 presence of defense counsel, defense investigator, or expert
15 witness;
- 16 d. Not permit Defendant to keep discovery in his own possession
17 outside the presence of defense counsel or a defense investigator;
18 and
- 19 e. Not permit Defendant to keep, copy, or record the identities of any
20 minor or victim identified in discovery in this case.

21 3. IT IS FURTHER ORDERED that all papers to be filed in Court that
22 disclose the names or any other information identifying or concerning minors shall be
23 filed under seal without necessity of obtaining a Court order, and that the person who
24 makes the filing shall submit to the Clerk of the Court:

- 25 a. The complete paper to be kept under seal; and
- 26 b. The paper with the portions of it that disclose the names or other
27 information identifying or concerning children redacted, to be
28 placed in the public record.

**ORDER STIPULATED PROTECTIVE ORDER REGARDING
IDENTIFICATION OF MINOR VICTIM OR WITNESS ~ 2**

1 4. IT IS FURTHER ORDERED that the parties and the witnesses shall not
2 disclose minors' identities during any proceedings connected with this case. The
3 parties and witnesses will refer to alleged minor victims or witnesses only by using
4 agreed-upon initials or pseudonyms (e.g., "Minor Victim 1"), rather than their bona
5 fide names, in motions practice, opening statements, during the presentation of
6 evidence, in closing arguments, and during sentencing.

7 5. IT IS FURTHER ORDERED that the government may produce discovery
8 to the defense that discloses the identity and images of the alleged minor victim or
9 witness in this case, in order to comply with the government's discovery obligations.
10 Defendant, the defense team, Defendant's attorneys and investigators, and all of their
11 externs, employees, expert witnesses and/or staff members, shall keep this information
12 confidential as set forth above.

13 6. IT IS FURTHER ORDERED that this ORDER shall apply to any
14 attorneys who subsequently become counsel of record, without the need to renew or
15 alter the ORDER.

16 7. IT IS FURTHER ORDERED that this ORDER shall apply to the personal
17 identifying information and images of any minors who are identified over the course of
18 the case, whether or not such minors are known to the government and/or Defendant at
19 the time the ORDER is entered by the Court.

20 **IT IS SO ORDERED.** The District Court Clerk is hereby directed to enter this
21 Order and provide copies to counsel.

22 | DATED this 30th day of June 2025.



Stan Bastian

Stan Bastian
Chief United States District Judge

ORDER STIPULATED PROTECTIVE ORDER REGARDING IDENTIFICATION OF MINOR VICTIM OR WITNESS ~ 3